

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IRA FINANCIAL TRUST,  
*Plaintiff*,  
v.  
GEMINI TRUST COMPANY, LLC,  
*Defendant.*

Case No. 1:22-cv-04672 (AT)(JLC)

Hon. Analisa Torres

**NOTICE OF DEFENDANT'S  
MOTION TO COMPEL  
ARBITRATION**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Travis Freeman, dated July 28, 2022, and its attached exhibits, Defendant Gemini Trust Company, LLC ("Defendant"), by and through its undersigned counsel, will move this court, the United States District Court, Southern District of New York, at such time and place as the Court designates, before the Honorable Analisa Torres, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order compelling IRA Financial Trust to arbitrate its claims with Defendant, and for any further relief that the Court may deem just and proper.

Dated: New York, New York  
July 28, 2022

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By /s/ John F. Baughman

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